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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, SAL
CATALDO, JULIAN
SANTIAGO, and SUSAN LYNN
HARVEY, individually and on behalf of all
others similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,
Defendant.

Case No.: 3:20-cv-04688-RS

**ADMINISTRATIVE MOTION TO SEAL
AND TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL
SHOULD BE SEALED**

The Honorable Richard Seeborg
Courtroom 3 – 17th Floor
Date: February 13, 2025
Time: 1:30 P.M.

Pursuant to Civil Local Rule 79-5, Plaintiffs respectfully move to seal limited, private information regarding the Plaintiffs. Plaintiffs also respectfully ask the Court to consider whether Google LLC's ("Google") material should be sealed. The material is included within Plaintiffs' Opposition to Google's Motion to Strike the Damages Supplement.

Document Sought to be Sealed	Party Claiming Confidentiality	Portions to be filed under seal	Basis for Sealing Portion of Document
Mao Exhibit 2	Plaintiffs	Highlighted portions comprising Plaintiffs' home addresses and phone numbers	Refers to sensitive personal material designated "Confidential" by Plaintiffs pursuant to the protective order
Mao Exhibit 3	Plaintiffs	Highlighted portions comprising Plaintiffs' home addresses and phone numbers	Refers to sensitive personal material designated "Confidential" by Plaintiffs pursuant to the protective order
Mao Exhibit 9	Plaintiffs	Highlighted portions comprising Plaintiffs' home addresses and phone numbers	Refers to sensitive personal material designated "Confidential" by Plaintiffs pursuant to the protective order
Mao Exhibit 11	Google	Entirety	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order

Plaintiffs only seek to seal portions of their Rule 26(a)(1) disclosures that reveal Plaintiffs' sensitive information, namely their addresses and phone numbers. As explained in earlier motions to seal, there is a compelling reason to seal this information because it would undermine the Plaintiffs' privacy interests. *See Nursing Home Pension Fund v. Oracle Corp.*, 2007 WL 3232267, at *2 (N.D. Cal. Nov. 1, 2007) ("an individual's privacy interest" is a compelling reason to seal a document). Plaintiffs' narrowly tailored proposal "will not interfere with the public's ability to understand the judicial process" because their addresses and phone numbers are not relevant to the

1 issues implicated by Google's motion to strike. *Ojmar US, LLC v. Sec. People, Inc.*, 2016 WL
 2 6091543, at *2 (N.D. Cal. Oct. 19, 2016). The Court previously granted Plaintiffs' request to seal
 3 this information in connection with other filings. *See* Dkts. 429, 430. For these reasons, Plaintiffs
 4 respectfully request permission to maintain this information under seal.

5 The remaining exhibits concern information Google has previously designated confidential
 6 or highly confidential under the protective order. As the designating party with respect to those
 7 materials, Google bears the burden to show that this material should be maintained under seal.

8
 9 Dated: January 16, 2025

Respectfully submitted,

10 By: /s/ Mark C. Mao

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